

Message

**From:** waltermugdan@aol.com [waltermugdan@aol.com]  
**Sent:** 12/12/2010 12:05:51 AM  
**To:** Garbarini.Doug@epamail.epa.gov; stugbawa@louisberger.com; egarvey@louisberger.com; Mugdan.Walter@epamail.epa.gov  
**CC:** Conetta.Benny@epamail.epa.gov; bfidler@louisberger.com; King.David@epamail.epa.gov; Klawinski.Gary@epamail.epa.gov; simon.paul@epa.gov; schaaf.eric@epa.gov; fischer.douglas@epamail.epa.gov  
**Subject:** Summary of Discussion about Resuspension Standards  
**Attachments:** Resuspension Standard Proposals.docx

See attached document in which I have attempted to summarize where we are on the Resuspension standards. (I believe Solomon is working on incorporating these concepts into the document.) We will discuss these with GE at 9 AM on Sunday; we'll also discuss the capping Metric of Success during that call.

The call-in number for the Sunday morning call is

**Ex. 6 Personal Privacy (PP)**

-----Original Message-----

**From:** Garbarini.Doug <Garbarini.Doug@epamail.epa.gov>  
**To:** Gbondo-Tugbawa, Solomon <stugbawa@louisberger.com>; egarvey <egarvey@louisberger.com>; Mugdan.Walter <Mugdan.Walter@epamail.epa.gov>; waltermugdan <waltermugdan@aol.com>  
**Cc:** Conetta.Benny <Conetta.Benny@epamail.epa.gov>; Fidler, Bruce <bfidler@louisberger.com>; King.David <King.David@epamail.epa.gov>; Klawinski.Gary <Klawinski.Gary@epamail.epa.gov>  
**Sent:** Sat, Dec 11, 2010 5:30 pm  
**Subject:** RE: Effect of Longer Block Average and High Flow on Resuspension Load Standard

Please call the hudson team number at 5:30

**Ex. 6 Personal Privacy (PP)**

**From:** "Gbondo-Tugbawa, Solomon" <stugbawa@louisberger.com>  
**To:** Benny Conetta/R2/USEPA/US@EPA  
**Cc:** "Fidler, Bruce" <bfidler@louisberger.com>; David King/R2/USEPA/US@EPA, Doug Garbarini/R2/USEPA/US@EPA, Gary Klawinski/R2/USEPA/US@EPA, "Atmadja, Juliana" <jatmadja@louisberger.com>; "Bilimoria, Maheyar" <mbilimoria@louisberger.com>; Paul Simon/R2/USEPA/US@EPA, "McDonald, Shane" <smcdonald@louisberger.com>; Walter Mugdan/R2/USEPA/US@EPA  
**Date:** 12/11/2010 03:57 PM  
**Subject:** RE: Effect of Longer Block Average and High Flow on Resuspension Load Standard

Here's a brief summary (see Table below)

Note that period used for the running average was applied to both the load and the flows.

- 1) No significant differences between the total number of exceedances for 14-day running average (GE's proposal) vs. 7-day running average.
- 2) At TI, the majority of the exceedances occurred between 5,000 to 7500 cfs. At average flows < 5,000 cfs, no exceedance occurred.
- 3) At Waterford doing a longer average period (21 days or 28 days) == get out of jail free card.
- 4) Stopping the operation only when the standard is exceeded at flows > 7,500 cfs == get out of jail free card.

Station	14-day Exceedance Based on 7-day Running Average	14-day Exceedance Based on 14-day Running Average
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	Total	Flow < 5000	Flow between 5000 and 7500	Flow >7500	Total	Flow < 5000	Flow between 5000 and 7500	Flow >7500
Lock 5	2	0	0	2	0	0	0	0
TID	16	0	14	2	14	0	14	0
Waterford	3	0	1	2	1	0	1	0

**From:** Conetta.Benny@epamail.epa.gov [mailto:Conetta.Benny@epamail.epa.gov]

**Sent:** Saturday, December 11, 2010 2:11 PM

**To:** Gbondo-Tugbawa, Solomon

**Cc:** Fidler, Bruce; King.David@epamail.epa.gov; Garbarini.Doug@epamail.epa.gov; Klawinski.Gary@epamail.epa.gov; Atmadja, Juliana; Bilimoria, Maheyar; Simon.Paul@epamail.epa.gov; McDonald, Shane; Mugdan.Walter@epamail.epa.gov

**Subject:** RE: Effect of Longer Block Average and High Flow on Resuspension Load Standard

can you give a short summary of your findings?

-----"Gbondo-Tugbawa, Solomon" <stugbawa@louisberger.com> wrote: -----

To: Benny Conetta/R2/USEPA/US@EPA

From: "Gbondo-Tugbawa, Solomon" <stugbawa@louisberger.com>

Date: 12/11/2010 02:10PM

Cc: David King/R2/USEPA/US@EPA, "Fidler, Bruce" <bfidler@louisberger.com>, Doug Garbarini/R2/USEPA/US@EPA, Gary Klawinski/R2/USEPA/US@EPA, "Atmadja, Juliana" <jatmadja@louisberger.com>, "Bilimoria, Maheyar" <mbilimoria@louisberger.com>, "McDonald, Shane" <smcdonald@louisberger.com>, Walter Mugdan/R2/USEPA/US@EPA, "McDonald, Shane" <smcdonald@louisberger.com>, "Bilimoria, Maheyar" <mbilimoria@louisberger.com>, Paul Simon/R2/USEPA/US@EPA

Subject: RE: Effect of Longer Block Average and High Flow on Resuspension Load Standard

Ben,

Using the Phase 1 data, I assessed the load standards at the far-field stations TI (2%), Lock 5 (2%) and Waterford (1%) using different running average basis as follows:

- 1) Estimated the number of "14 or more consecutive days", exceedances for load on a **7-day average basis** (this is what is in the standard currently).
- 2) Estimated the number of "14 or more consecutive days" exceedances for load on a **14-day average basis** (this is GE's proposal)
- 3) For Waterford an additional scenario of the number of "14 or more consecutive days" exceedances for load on a **28-day running average basis** was also considered (another GE proposal).
- 4) I categorized the number of exceedances into flow bins as follows: < 5,000 cfs, between 5,000 – 7,500 cfs, and > 7,500 cfs (Fort Edward Flow).

I will summarize the results during our call tomorrow.

Let me know if you need additional calculations done.